

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	CASE NO: 4:19-CR00411 RLW
	)	
	)	
vs.	)	
	)	
DESTIN WHITE,	)	
	)	
Defendant.	)	

**MOTION TO TRAVEL**

Comes now Defendant, Destin White, by and through counsel, Peter M. Cohen and respectfully requests this Honorable Court allow the Defendant to travel to Nevada on December 30, 2020 and returning on January 2, 2021 for the holiday and his mother's birthday. The Defendant has been in strict compliance with his release orders from this Honorable Court and in perfect standing with his supervision officers in both Missouri and in Cleveland. The Defendant has traveled numerous times throughout the last year for work purposes without issues. Defendant has provided all travel plans and address where he will be staying with his family.

Counsel has consulted AUSA Stephen Casey and he has no objection. Pretrial Services Officer, Molly Gains has no objection but will need a copy of Defendant's itinerary and where he will be staying in Nevada. Counsel apologizes for the late notice on this motion, but his secretary has been out of the office.

WHEREFORE, upon consideration of these factors, the Defendant respectfully requests this Court to allow Defendant to travel on the aforementioned dates.

Respectfully Submitted,

/s/ Peter M. Cohen  
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CERTIFICATE OF SERVICE

A copy of the foregoing was via ECF filed electronically on this 29<sup>th</sup> day of December, 2020 to: Assistant United States Attorney, 111 So. 10<sup>th</sup> St., 20<sup>th</sup> Fl., St. Louis, MO 63103.

/s/ Peter M. Cohen  
Attorney at Law